

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

ASHEVILLE DIVISION

JANE ROE,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Civil No. 1:20-cv-00066

**DECLARATION IN SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION TO PROCEED
UNDER PSEUDONYM AND TO SEAL PERSONALLY IDENTIFYING
INFORMATION**

I, Jane Roe, the Plaintiff in this matter proceeding under a pseudonym, state as follows:

1. I am a competent adult of the age of majority and am able to testify as to the following facts by personal knowledge. The facts in this declaration are true and correct to the best of my knowledge, information, and belief, and I am competent to testify to them if called upon to do so.
2. I was subjected to sexual harassment, retaliation, and discrimination during my employment as an attorney in the federal judiciary, resulting in my constructive discharge.
3. Prior to filing this action, I sought relief under the Fourth Circuit's Employment Dispute Resolution Plan.
4. Defendants have actual or constructive knowledge of my identity.
5. I continue to suffer physically, mentally, and emotionally from these experiences.

6. My career and personal relationships continue to suffer as a result of these experiences.

7. This litigation involves matters that are highly sensitive of a personal and professional nature, and I believe that identification of my name or identity, during the pre-trial stages of this proceeding, would have a chilling effect on my desire to exercise my rights.

8. I believe public identification of my identity, during the pre-trial stages of this proceeding, would further damage (a) my physical, mental, and emotional well-being, (b) my career, and (c) my personal relationships, causing me additional harm.

9. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: March 3, 2019

A handwritten signature in cursive script that reads "Jane Roe". The signature is written in black ink and is positioned above a horizontal line.

Jane Roe, a pseudonym